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IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE	§	
	§	
LOCHRANN'S IRISH PUB & EATERY, LTD	§	CASE 10-43929-11
	§	
DEBTOR	§	

DEBTOR'S RESPONSE TO MOTION TO DISMISS OR CONVERT

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE BRENDA T. RHOADES:

COMES NOW, Lochrann's Irish Pub & Eatery, Ltd., Debtor in the above styled and numbered cause and files this their Debtor's Response to Motion to Dismiss or Convert and in support thereof would respectfully show unto the Court as follows:

1. Debtor admits the allegations contained in paragraphs 1 and 2 of the motion.
2. Debtor would show that it has returned the obligations, it has filed operating reports ity has provided proof of insurance. The debtor would show that the zero balance statement had not been provided only because some checks had still not cleared the Debtor account. All pre-petition account statement have now been provided.
3. The Debtor's business is currently operating and has paid all post-petition obligations.
4. The is willing to enter into an agreement to have a plan confirmed by a date certain.

The Debtor would propose that it have a plan on file by March 31, 2011 and have a confirmation no later than May 31, 2011.

WHEREFORE PREMISES CONSIDERED, the Debtor respectfully requests this matter be set down for hearing and upon final hearing hereon the Court enter an Order denying the Motion and for such other and further relief in law or in equity to which the Debtor may show itself justly entitled.

Respectfully submitted,

/s/ Eric Liepins
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent to United States Trustee on this the 14th day of February, 2011.

/s/ Eric Liepins
Eric Liepins